

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

JAVIER AMBLER, SR., and MARITZA AMBLER, individually, on behalf of all wrongful death beneficiaries of JAVIER AMBLER, II, on behalf of the ESTATE OF JAVEIR AMBLER, II, and as next friends of J.R.A., a minor child; and MICHELE BEITIA, as next friend of J.A.A., a minor child, §  
Plaintiffs, §  
v. §  
WILLIAMSON COUNTY, TEXAS §  
Defendant. §

Civil Action No. 1:20-cv-1068-LY

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO EXTEND PAGE LIMIT  
IN RESPONSE TO DEFENDANT WILLIAMSON COUNTY'S MOTION TO  
DISMISS**

---

Plaintiffs respectfully request leave of Court to file a response to Defendant Williamson County's motion to dismiss in excess of the Court's page limit. Plaintiffs seek leave of Court to file a response with text that (exclusive of caption, signatures, certificates, and exhibits) shall not exceed 28 pages. Defendants are unopposed.

The Court's default page limit for a response to dispositive motions is 20 pages. W.D. TEX. CV-7-1(e)(3). Defendant Williamson County filed a motion to dismiss pursuant to Rule 56. Doc. 13. Plaintiffs believe the Court will benefit from discussion of the record and the applicable legal authorities that will slightly exceed the default page limit, in this case where the Plaintiffs allege multiple complex claims.

To the extent necessary, the Plaintiffs respectfully move for leave to file a response in opposition to Defendant Williamson County's motion to dismiss not more than 28 pages in length, excluding the caption, signature block, required certificates, and accompanying documents. Doc. 13.

Respectfully submitted:

**EDWARDS LAW**  
1101 East 11<sup>th</sup> Street  
Tel. 512-623-7727  
Fax. 512-623-7729

By /s/ Jeff Edwards  
**JEFF EDWARDS**  
State Bar No. 24014406  
jeff@edwards-law.com  
**SCOTT MEDLOCK**  
State Bar No. 24044783  
scott@edwards-law.com  
**DAVID JAMES**  
State Bar No. 24092572  
david@edwards-law.com

**ATTORNEYS FOR  
PLAINTIFFS JAVIER  
AMBLER, SR., MARITZA  
AMBLER, AND J.R.A.**

Ben Crump (*pro hac pending*)  
(Washington, D.C. Bar No. 1552623)  
Ben Crump Law  
717 D Street N.W., Suite 310  
Washington, D.C. 20004  
Phone: 800-859-9999  
Fax: 800-770-3444  
[ben@bencrump.com](mailto:ben@bencrump.com)

Antonio M. Romanucci (*pro hac pending*)  
(Illinois ARDC No. 6190290)  
Bhavani Raveendran (*pro hac pending*)  
(Illinois ARDC No. 6309968)  
Ian P. Fallon (*pro hac pending*)  
(Illinois ARDC No. 6332303)  
**ROMANUCCI & BLANDIN, LLC**  
321 N. Clark Street, Suite 900  
Chicago, Illinois 60654  
Tel: (312) 458-1000  
Fax: (312) 458-1004  
[aromanucci@rblaw.net](mailto:aromanucci@rblaw.net)  
[braveendran@rblaw.net](mailto:braveendran@rblaw.net)  
ifallon@rblaw.net

**ATTORNEYS FOR PLAINTIFF MICHELE  
BEITIA, FOR J.A.A.**

CERTIFICATE OF SERVICE

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Western District of Texas.

By      /s/ Jeff Edwards  
Jeff Edwards

CERTIFICATE OF CONFERENCE

By my signature below, I certify that I conferred with counsel for Defendants and they are not opposed to the relief requested in this motion.

By      /s/ Jeff Edwards  
Jeff Edwards